

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE SEPTEMBER 11 LITIGATION

21 MC 101 (AKH)
This document relates to:
Bavis v. United Airlines Inc.
et al., 02 Civ. 7154;
World Trade Center
Properties LLC, et al. v.
United Airlines, Inc. et al.,
08 Civ. 3719; and
World Trade Center
Properties, LLC et al. v.
American Airlines, Inc., et
al., 08 Civ. 3722

DECLARATION OF DAVID W. SASS

DAVID W. SASS hereby declares as follows:

1. I submit this declaration, pursuant to 28 U.S.C. §1746, in support of the motion of ICTS International, N.V. ("ICTS") for summary judgment dismissing the remaining actions pending against it.
2. I am an attorney licensed to practice in the Courts of the State of New York, and I am a member of McLaughlin & Stern, LLP, attorneys for ICTS in these actions. I have personal knowledge of the facts set forth in this declaration.
3. ICTS is a corporation organized and existing under the laws of The Netherlands. In 2000 and 2001, I acted as general counsel for ICTS.
4. In 2000 and 2001 ICTS had (and still has) a wholly owned subsidiary, ICTS USA, Inc. ("ICTS USA"), which in those years was known as ICTS (1994) USA, Inc. ICTS USA is a corporation organized and existing under the laws of the State of New York. In 2000 and 2001,

I was a member of ICTS USA's board of directors, and in 2001 I served as its corporate secretary.

5. Effective as of January 1, 1999, ICTS USA purchased 80% of the stock of Huntleigh USA, Corporation ("Huntleigh"), and effective October 17, 2000 it purchased the remaining 20% of Huntleigh stock. Huntleigh has been, and still is, a wholly owned subsidiary of ICTS USA since October 17, 2000. Huntleigh is a corporation organized and existing under the laws of the State of Missouri. In 2001 I was a member of Huntleigh's board of directors, and I also served as its corporate secretary.

6. In 2000 and 2001, ICTS, ICTS USA and Huntleigh each had separate boards of directors. In 2000 and 2001 the boards of ICTS, ICTS USA and Huntleigh had some overlapping members, but none of the boards was identical with either of the other two.

7. In 2000 I was corporate secretary for ICTS USA, but I was not a corporate officer of either ICTS or Huntleigh during that year. In 2001 I was corporate secretary of each of ICTS USA and Huntleigh, but I was not a corporate officer of ICTS in that year. None of the other corporate officers of either ICTS or ICTS USA also served as a corporate officer of Huntleigh during either of 2000 or 2001.

8. From 1999 through 2001, and thereafter, the three companies operated as three separate entities. They each had different principal places of business. In 2000 and 2001 ICTS' principal place of business was located in Amsterdam, The Netherlands. In 2000 and 2001, ICTS USA's principal place of business was located in New York, New York. In 2000 and 2001, Huntleigh's principal place of business was located in St. Louis, Missouri. Each of the three companies kept separate books and records. Each of the three companies had separate bank

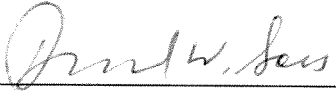
accounts.

9. In 2000 and 2001 Huntleigh's president, Joseph Tuero, was in charge of Huntleigh's day to day business operations. Mr. Tuero was not a board member or corporate officer of either ICTS or ICTS USA.

10. Huntleigh entered into contracts to provide security screening services in the United States in its name and not in the name of any other company. Huntleigh hired and paid its security screening personnel.

11. I declare under penalties of perjury that the foregoing is true and correct.

Dated: May 3, 2011



David W. Sass